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Attorneys for Plaintiff
ANDREA NAKAGAWA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANDREA NAKAGAWA,)	Case No.	C06-02066 SI
)		
Plaintiff,)	STIPULATION FOR	
)	ENLARGEMENT OF TIME FOR	
vs.)	COMPLETION OF DISCOVERY	
)		
THE REGENTS OF THE UNIVERSITY)		
OF CALIFORNIA, et al.,)		
)		
Defendants.)		

TO THE HONORABLE COURT:

The parties to the above-captioned action, pursuant to Local Rule 6-2(a) hereby request the Court to extend the date for discovery cut-off, currently set for June 13, 2008 as established in the Court's Pre-trial Preparation Order filed on October 9, 2007, pursuant to the parties' stipulation as described below.

STIPULATION AND DECLARATION IN SUPPORT THEREOF
TO ENLARGE THE TIME FOR COMPLETION OF DISCOVERY

_____The parties to the above-captioned action, by and through their undersigned counsel of record, hereby stipulate and agree to extend the date for discovery cutoff currently set for June 13,

2008 by 30 days to July 13, 2008.

In support of the foregoing Stipulation, the parties through their undersigned counsel ,
declare as follows:

1. On October 9, 2007, this Court granted a modification to the Pre-Trial Preparation Order, establishing June 13, 2008 as the discovery cutoff date for both expert and non-expert discovery requests.

2. On March 20, 2008, Plaintiff filed a Motion to Compel Production of Personnel Files in this case. The Court responded to Plaintiff's Motion on April 22, 2008, partially granting Plaintiff's request for personnel files. Defendants, as a result, have had thirty (30) days to submit these personnel files. Plaintiff expects to receive these personnel files very shortly.

3. Plaintiff anticipates propounding additional discovery requests upon review of these personnel files. Pursuant to Federal Rules of Civil Procedure, Rule 33(b)(2) and Rule 34(b)(2)(A), parties have thirty (30) days to respond to discovery requests propounded to them. The current date set for discovery cutoff on June 13, 2008 will not provide Defendants with the requisite thirty days (30) to respond to these anticipated discovery requests. Therefore, Plaintiff will require additional time in discovery to submit these discovery requests and obtain responses from Defendant to these discovery requests.

4. Further, the parties are currently in the process of "meeting and conferring" on other discovery issues and scheduling depositions during this month. Also, Plaintiff's Counsels will be at trial during much of the month of June on a complex litigation matter in another case and will be preparing for the trial during the month of May. The additional 30 days of discovery will help ease the burden of scheduling depositions and resolving discovery issues in this case during this period.

5. The parties still anticipate appearing for the scheduled settlement conference on June 26, 2008 with Magistrate Judge Elizabeth LaPorte, as most of the discovery will have been

completed by then. The parties request that the succeeding dates from the Pre-Trial Preparation Order be amended as follows:

<u>Event</u>	<u>Current Date</u>	<u>New Date</u>
Dispositive Motions Filed	July 11, 2008	August 11, 2008
Opposition to Motions Due	July 25, 2008	August 25, 2008
Reply to Motions Due	August 1, 2008	September 1, 2008
Dispositive Motion Hearing Date	August 17, 2008	September 17, 2008
Pre-Trial Conference Date	September 23, 2008	September 30, 2008

6. For the foregoing reasons, the parties hereto, by and through their undersigned counsel, declare, under penalty of perjury, that the foregoing statements are true and correct, and request the Court to extend the the discovery cutoff date by one month as set forth above.

Respectfully submitted,

LAW OFFICES OF NEVIN & ABSALOM

Dated: May 22, 2008

By: /S/

KENNETH C. ABSALOM
Attorney for Plaintiffs

GORDON AND REES, LLP

Dated: May 22, 2008

/S/

By: MICHAEL A. LAURENSEN
Attorneys for Defendants

PURSUANT TO STIPULATION, IT IS SO ORDERED,

Dated: May , 2008

UNITED STATES DISTRICT JUDGE